



**LAW OFFICES OF**  
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Application granted. Plaintiff's time to respond to Defendant's 56.1 Statement and pre-motion conference letter is extended to and including June 30, 2022.

The Clerk of the Court is respectfully directed to terminate the motion sequence pending at Doc. 168.

SO ORDERED.

Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
June 29, 2022

**VIA ECF**

Honorable Philip M. Halpern  
Hon. Charles L. Brieant Jr. Federal  
Building & Courthouse  
300 Quarropas Street  
Room 530  
White Plains, New York 10601

Re: *Dante Daly v. Westchester Board of Legislators*  
Civil Action No. 19-cv-04642 (PMH)

Dear Judge Halpern:

As you are aware, I represent plaintiff Mr. Dante Daly in this disability discrimination. With no objection from defense counsel, and on behalf of plaintiff, the undersigned requests that Your Honor extend the deadline to file plaintiff's (and/or his portion of) Rule 56.1 Statement and pre-motion letter for an additional two (2) days until on or by Thursday, June 30, 2022 at 5:00 PM.

The main reasons for Plaintiff's request for this extension is that the final deposition required for discovery in this case was scheduled to end at 4:00 PM today, and was finished approximately fifteen (15) minutes ago. Plaintiff requests time to review the evidentiary record, and incorporate it into the Rule 56.1 Statement and pre-motion letter. This is the first request for an extension by the plaintiff with respect to service/ filing of these documents.

On behalf of the Plaintiff, and with no objection by defense counsel, the undersigned respectfully requests that the Court extend the deadlines for plaintiff's (and/or its portion thereof) of his Rule 56.1 Statement and pre-motion letter for an additional two (2) days until on or by June 30, 2022 at 5:00 PM.

Thank you for Your Honor's attention.

Respectfully Submitted,

/S/ *Jimmy M. Santos*

Jimmy M. Santos, Esq.

cc: Irma M. Cosgriff, Esq., defendant's counsel  
(via ECF only)